

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JCC

**STIPULATED MOTION FOR ENTRY
OF CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:
AUGUST 22, 2022**

The Court's August 16, 2022 Order (Dkt. # 96) instructed the parties to confer and to provide the Court with a proposed case schedule through summary judgment briefing. The parties conferred and jointly propose that the Court enter the following case schedule.

EVENT	DATE
Rolling Document Productions Begin	September 30, 2022
Substantial Completion of Transactional Data Production	March 1, 2023
Substantial Completion of Parties' Document Productions	May 1, 2023
Final Deadline for Service of Third-Party Document Subpoenas	June 30, 2023
Deadline to Amend Complaint	March 1, 2023
Close of Fact Discovery	October 31, 2023

EVENT	DATE
Deadline to (i) file Plaintiffs' Motion for Class Certification accompanied by the evidence and declarations on which Plaintiffs rely, and (ii) disclose Plaintiffs' Class Certification Expert Report(s)	December 21, 2023
Deadline to (i) file Valve's Opposition to Class Certification accompanied by the evidence and declarations on which Plaintiffs rely, (ii) disclose Valve's Class Certification Expert Report(s), and (iii) file Valve's <i>Daubert</i> Motions on Plaintiffs' Class Certification Expert(s)	April 5, 2024
Deadline to (i) file Plaintiffs' Class Certification Reply, (ii) disclose Plaintiffs' Rebuttal Class Certification Expert Report(s), (iii) file Plaintiffs' <i>Daubert</i> Oppositions, and (iv) file Plaintiffs' <i>Daubert</i> Motions on Valve's Class Certification Expert(s)	June 6, 2024
Deadline to Complete Class Certification Expert Discovery	June 24, 2024
Deadline to file Valve's <i>Daubert</i> Replies and Valve's Opposition to Plaintiffs' <i>Daubert</i> Motions	July 9, 2024
Deadline to file Plaintiffs' <i>Daubert</i> Replies	July 22, 2024
Disclose Opening Merits Expert Report(s) (on issues for which the party bears the burden of proof)	60 days after any grant of class certification
Disclose Response Merits Expert Report(s)	120 days after any grant of class certification
Disclose Rebuttal Merits Expert Report(s)	150 days after any grant of class certification
Close of Merits Expert Discovery	165 days after any grant of class certification
Last day to file Motions for Summary Judgment and <i>Daubert</i> Motions on Merits Experts	180 days after any grant of class certification
Oppositions to Motions for Summary Judgment and <i>Daubert</i> Motions	240 days after any grant of class certification ¹
Replies to Motions for Summary Judgment and <i>Daubert</i> Motions	270 days after any grant of class certification

¹ Agreed opposition and reply dates listed here apply to summary judgment motions filed 180 days after any grant of class certification. The parties agree to meet and confer regarding opposition and reply dates for any earlier filed summary judgment motion if either party believes the default opposition and/or reply dates under the Local Rules are inadequate.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 22nd day of August, 2022.

s/ Alicia Cobb

Alicia Cobb, WSBA #48685
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1109 First Avenue, Suite 210
Seattle, Washington 98101
Telephone (206) 905-7000
Fax (206) 905-7100
aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)
David LeRay (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue
New York, New York 10010
Telephone (212) 849-7231
Fax (212) 849-7100
steigolson@quinnemanuel.com

Adam Wolfson (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone (213) 443-3285
Fax (213) 443-3100
adamwolfson@quinnmanuel.com

Charles Stevens (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California St., 22nd Floor
San Francisco, CA 94111
Telephone (415) 875-6600
Fax (415) 875-6700
charliestevens@quinnmanuel.com

Interim Co-Lead Counsel

s/ Stephanie L. Jensen

Stephanie L. Jensen, WSBA #42042
WILSON SONSINI GOODRICH &
ROSATI P.C.
701 Fifth Avenue, Suite 5100
Seattle, WA 98104-7036
Telephone (206) 883-2500
Fax (206) 883-2699
sjensen@wsgr.com

Kenneth R. O'Rourke (*pro hac vice*)
Scott A. Sher (*pro hac vice*)
Allison B. Smith (*pro hac vice*)
WILSON SONSINI GOODRICH &
ROSATI, P.C.
1700 K Street, NW, Suite 500
Washington, DC 20006
Telephone (202) 973-8800
Fax (202) 973-8899
korourke@wsgr.com
ssher@wsgr.com
allison.smith@wsgr.com

W. Joseph Bruckner (*pro hac vice*)
Joseph C. Bourne (*pro hac vice*)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Fax: (612) 339-0981
wjbruckner@locklaw.com
jcbourne@locklaw.com

Interim Co-Lead Counsel

1 David Golden (*pro hac vice*)
2 CONSTANTINE CANNON LLP
3 1001 Pennsylvania Ave., 22nd Floor
4 Washington, D.C. 20004
5 Telephone (202) 204-4527
6 Fax (202) 204-3501
7 dgolden@constantinecannon.com

8 A. Owen Glist (*pro hac vice*)
9 Ankur Kapoor (*pro hac vice*)
10 Jeffrey I. Shinder (*pro hac vice*)
11 CONSTANTINE CANNON LLP
12 335 Madison Avenue, 9th Floor
13 New York, NY 10017
14 Telephone (212) 350-2700
15 Fax (212) 350-2701
16 oglist@constantinecannon.com

17 *Interim Co-Lead Counsel*

18 Kenneth J. Rubin (*pro hac vice*)
19 Timothy B. McGranor (*pro hac vice*)
20 Kara M. Mundy (*pro hac vice*)
21 VORYS, SATER, SEYMOUR AND
PEASE LLP
22 52 East Gay Street
Columbus, Ohio 43215
Telephone (614) 464-6400
Fax (614) 719-4796
kjrubin@vorys.com
tbmcgranor@vorys.com
kmmundy@vorys.com

23 Thomas N. McCormick (*pro hac vice*)
24 VORYS, SATER, SEYMOUR AND
PEASE LLP
25 4675 MacArthur Court, Suite 700
Newport Beach, California 92660
Phone (949) 526-7903 | Fax (949) 383-2384
tnmccormick@vorys.com

26 *Interim Executive Committee Member*

s/ Gavin W. Skok

Gavin W. Skok, WSBA #29766
FOX ROTHSCHILD LLP
1001 Fourth Avenue, Suite 4400
Seattle, WA 98154
Telephone: (206) 624-3600
Fax: (206) 389-1708
gskok@foxrothschild.com

Kristen Ward Broz
FOX ROTHSCHILD LLP
2020 K. St. NW, Ste. 500
Washington, DC 20006
Telephone (202) 794-1220
Fax (202) 461-3102
kbroz@foxrothschild.com

Charles B. Casper (*pro hac vice*)
MONTGOMERY McCACKEN WALKER
& RHOADS LLP
1735 Market Street, 21st Floor
Philadelphia, PA 19103
Telephone (215) 772-1500
ccasper@mmwr.com

Attorneys for Defendant Valve Corporation

1 IT IS SO ORDERED.
2
3

4 DATED this 23rd day of August 2022.
5
6

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26



John C. Coughenour
UNITED STATES DISTRICT JUDGE